

Letter Motion for Compassionate Release
Appointment of Counsel

mail to

In re: U.S. v. Anthony Serrano, 53 13 Cr. 58 (KBF)

June 1, 2020

To the Honorable Alvin K. Hellerstein,

I am respectfully request to be appointed counsel to represent me and file a motion for compassionate release due to medical issues identified by the CDC which raise my risk of serious heightened medical risk because of the current COVID-19 coronavirus pandemic.

As I am certain your Honor is well aware, this Court has already recognized the threat that COVID-19 poses to individuals held in jails and other detention facilities; see U.S. v. Stephens, No. 15 CR 95, LEXIS 44846, WL 1295155, at *2, (S.D.N.Y., Mar. 19, 2020) (collecting cases).

Despite the efforts by the BOP to prevent the coronavirus from entering federal prisons, there are more than 60 documented inmate deaths, thousands of infected inmates, and hundreds of infected staff.

My ability to draft my Compassionate Release motion is severely hindered by the current lockdown quarantine currently in place at my institution, which prevents me from accessing typewriters, copy machines, printers, and allows me only limited access to the law library. Moreover, I am unlearned at law. Coupled with mail delivery delays, my request for

Compassionate Release would be rendered meaningless should I contract COVID-19 before your Honor could make an informed decision to either grant or deny my request.

Because of the extreme danger posed by Covid-19, I am respectfully requesting appointment of counsel* for the above stated reasons, or for any other relief this Honorable Court deems appropriate.

Respectfully submitted,

Anthony Serrano

Anthony Serrano

Date: June 1, 2020

* I am financially unable to retain counsel due to my incarceration and I was previously appointed counsel under the CJA.